

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CRAIG D. SCOTT, TRUSTEE OF THE)	
CRAIG D. SCOTT REVOCABLE TRUST, et)	CASE NO. 2:21-cv-03993
al.,)	
)	JUDGE WATSON
Plaintiffs,)	
)	MAGISTRATE JUDGE
vs.)	DEAVERS
)	
JEROME TOWNSHIP,)	
)	
Defendant)	

**DEFENDANT’S MEMORANDUM IN OPPOSITION TO THE MOTION TO
INTERVENE OF ROBERT G. CHAPMAN AND LYNDAL. CHAPMAN**

Defendant Jerome Township respectfully asserts that the Motion to Intervene of Robert G. Chapman and Lynda L. Chapman (Doc. 30) should be denied. The prospective intervenors cannot establish the elements to intervene in this case as of right or permissively.

Plaintiffs in this case have already filed their Opposition to the Motion to Intervene. See Doc. 31. Except to the extent that Plaintiff’s Opposition includes any statements arguing in support of Plaintiffs’ claims against Jerome Township, Jerome Township adopts fully all of Plaintiffs’ arguments against the proposed intervention and incorporates them herein by reference.

Respectfully submitted,

FREEMAN, MATHIS & GARY, LLP

/s/Michael S. Loughry

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Michael S. Loughry

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